

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Asbestos Products Liability
Litigation (No. VI)

This document relates to:

All cases included in the list attached
as Exhibit A

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MDL No. 875

**GENERAL ELECTRIC CO.'S
SCREENING AND EVALUATION INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO CVLO-1 PLAINTIFFS IDENTIFIED ON EXHIBIT A**

Pursuant to Federal Rules of Civil Procedure 33 and 34, Defendant, General Electric Co. requests that the Plaintiffs listed in each case on the attached Exhibit A provide sworn answers to the following Interrogatories and Requests for Production of Documents within thirty (30) days.

DEFINITIONS

1. "Plaintiff" means the Plaintiff or Plaintiff's Decedent.
2. "Document" means all documents and records of any kind, whether printed, written, produced by hand, or recorded or reproduced by any mechanical, digital, or electronic process. This includes any marginal comments appearing on any document.
3. When used in connection with a person, "identify" means to state that person's full name, current or last known residential and business addresses, current or last known residential and business telephone numbers, current or last known job title and place of employment, and, if known, whether the person is living or deceased.
4. When used in connection with a document, "identify" means to state with respect to each such document: the nature and substance thereof, the date it bears, the date it was prepared, the identity or identities of the author or authors thereof, the identity of each addressee, the identity or identities of the present custodian or custodians thereof, and the present location of the document.

INSTRUCTIONS

1. If you know of any document, communication, or information but cannot give the specific information or the full information the interrogatory or request for production calls for, provide the best information you have on the subject and identify each and every person you believe to have the requested information.
2. These requests seek answers based on all information available to you, however it was obtained, and any and all information in your actual or constructive possession or knowledge, or in the actual or constructive possession or knowledge of your attorneys, agents or representatives.
3. If you claim that your answer to an interrogatory (or a part thereof) or a response to a request for the production of documents (or a part thereof) is privileged or otherwise protected from discovery, identify the information or documents by subject matter and state with particularity the nature and basis of your claim.
4. If you object to any part of an interrogatory or request for production of documents, state the basis of your objection and also respond to all parts to which you do not object.

INTERROGATORIES

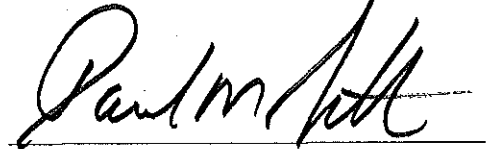
1. Identify all doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities involved in screenings or medical evaluations of Plaintiff for an asbestos-related disease, and the services performed by each such person or entity.
2. Identify all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

Respectfully submitted this 2nd day of September, 2011.

GENERAL ELECTRIC CO.



Walter G. Watkins, Jr.

Thomas W. Tardy, III

David M. Setter

Daniel J. Mulholland

John M. Seebohm

FORMAN PERRY WATKINS KRUTZ

& TARDY LLP

Denver Office:

1775 Sherman Street

Suite 1900

Denver, CO 80203

303.837.6400

CERTIFICATE OF SERVICE

I, David M. Setter, do hereby certify that I have this date served the above and foregoing on counsel for the Plaintiffs identified on Exhibit A hereto via first class U.S. Mail and via email, and via email to all counsel for Defendants.

THIS, the 2nd day of September, 2011.

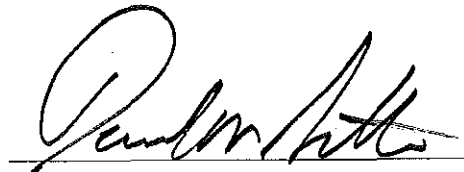


EXHIBIT A

Plaintiff Last Name	Plaintiff First Name	State	District	Local Case #	EDPA Case #
ANUSZKIEWICZ	ROMAN	IN	NORTHERN	00-00493	08-CV-90938
BROOKS	RAY	IL	CENTRAL	00-1214	08-CV-92194
COHEN	RONALD	IN	SOUTHERN	00-0024	09-CV-64755
CRIFE	GEORGE	IL	CENTRAL	00-2161	08-CV-91940
DALTON	JACK	IL	CENTRAL	01-2014	08-CV-91944
DAVIS	EDGAR	IL	CENTRAL	00-1407	08-CV-92201
DUAL	MONTE	IL	CENTRAL	01-4008	08-CV-92314
GARD	ROBERT	IN	NORTHERN	00-0004	10-CV-67613
HELTERS	CARL	IL	CENTRAL	00-1234	08-CV-92196
HENNEY	JEAN	IN	SOUTHERN	99-0175	09-CV-64629
HILL	JOHN	IL	SOUTHERN	97-4209	10-CV-64557
HOLDEN	MICHAEL	IL	CENTRAL	00-2125	08-CV-92154
HOSKINS	ADAM	IL	SOUTHERN	99-0459	08-CV-89474
HULMES	DARRELL	IL	CENTRAL	99-2206	08-CV-92135
KENNEDY	ROY	IL	SOUTHERN	99-0677	08-CV-89492
MARCOGLIESE	FRANK	IL	SOUTHERN	00-0009	08-CV-89497
MARESCA	JOSEPH	IL	NORTHERN	95-50066	08-CV-90328
MARTIN	DAVID	IL	CENTRAL	09-2308	10-CV-61109
MATHENEY	ROY	IL	CENTRAL	07-2223	08-CV-91955
MOORE	GEORGE	IL	CENTRAL	00-3332	08-CV-91869
MORR	LEE	IL	CENTRAL	00-2049	08-CV-92152
O'KEEFE	ROBERT	IL	CENTRAL	06-1308	08-CV-92210
ROGERS	JOHN	IL	CENTRAL	99-1204	08-CV-92167
SCHUCK	WALTER	IL	CENTRAL	01-1048	08-CV-92205
SMITH	RONALD	IL	NORTHERN	06-3759	08-CV-90287
SPRAGUE	BILLY	IL	NORTHERN	00-3587	08-CV-90112
TURNER	LARRY	IL	NORTHERN	98-6518	08-CV-89903
UNZICKER	LEONARD	IL	SOUTHERN	11-224	11-CV-66288
WIKER	PHILIP	IL	CENTRAL	01-1170	08-CV-92207